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Plaintiff

Alexander C. Kazerooni

Civil Action No.

Case.2:18-cv-11326 Judge: Murphy, Stephen J. MJ: Majzoub, Mona K.

Filed: 04-27-2018 At 03:25 PM

CMP KAZEROONI V. ZURBUCHEN ET AL (N

A)

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Defendant
Thomas H. Zurbuchen,
Matthew Schembechler,
Ella Kazerooni-Nino,
University of Michigan,
University of Michigan College of Engineering,
University of Michigan Ford School of Public Policy

COMPLAINT FOR DECLARATORY AND INJUNCTIVE RELIEF

Plaintiff (collectively with United Statese) seeks declaratory and injunctive relief against defendants based on the following allegations.

NATURE OF THE ACTION

I am hoping for Injunctive relief to complete my master's of space systems engineering at Univ. Michigan, they have set the time of 11:59PM, THUR, APRIL 26th, 2018. After that they will end or revoke my admission to the program.

1. For the past 4 of 5 years, I have been homeless due to actions by the university that include, but not limited to the following:

- 2. During that time I raised \$230,000 for the university as a student caller fundraising through the Univ. Dev. office by calling alumni and no emergency financial aid or job assistance was available, despite the Director saying she only graduated with her dual degree because her mentor helped her find a job to pay the bills.
- 3. I reported a professor to NASA after he wrote me off the grant I invited him to be on and had written myself, and that is proven by the 5 preceding years of writing versions of that grant. As a result, more 'blackballs' started to happen.
- 4. Dr. Brophy told me that Dr. Zerbuchen was telling everyone at UM to not work with nor hire me. Dr. Brophy said he hired me to be his TA, because I was the only one to mention giving something back to the the class after having taken the class with high marks. Dr. Brophy only told me this because he wanted me to succeed, told me after my TA time concluded, and warned me that "I needed to leave Ann Arbor, they have it out for me"
- 5. When I returned from working in Chicago for a year at Navistar and left through volunteer attrition due to their near bankrupcy, the funds helped me to correct my sister's negligent care of our mother with Alzheimer's. My sister, a Univ. Michigan Hospital upper level MD, interim chair tried to bribe me by paying all my student
- loans and \$2,000 /mth if I didn't mention what she did with our mom under her POA, by sending her out of state to Fla (outside her POA state jurisdiction) after I disclosed sister was operating on a holographic will after parent was declared incapacitated. Her mentor at the hospital also threatened me by saying "she's too important to the Univ. to allow me to take her to court over our mother's health care"
- 6. Bo Shembechler's son tried to have me sign up for the ARbor Blue program under the guise of a job interview via LinkedIN. He described the entire program, who managed it and what was available. He painstakenly indicated that after going through my questions of each individual position was available or not, the only positions available were 'bed's; as as high suicide risk student. I said I'm not suicidal, nor depressed, that's just my sister misusing her medical degree and reputation to cover up what's she's done illegally. But I'd like to find a job in the area. He emailed back that there were no opportunities now nor in the future. Odd response.
- 7. Part of the challenge to graduate has been a a \$8500 hold credit. Two parts of that hold credit arise from i) 3 classes where UI M CoE professors broke from the student handbook and resulted in my Incomplete in their course a) required purchase of software, against Student Handbook, b) left town early for the holidays rather than give exam on the final exam day, I couldn't take the exam on the bumped up day because I was turning in a 3yr , \$2.3M NASA, NSBRI grant; exams can only be moved with unanimous class support. I stated I could not do it—and ii) the school of public policy accepted me into their certificate program I started taking the 2nd class, then at the end of the semester they said I wasn't in the program. I had reported a janitor for stealing bicycles earlier in the semester, and the Director called me in to discuss it, but only discussed a lawsuit re: a neck injury I had, later when that director left, the interim director said i was in the program via my admission letter, but the teacher for the last required class of 3 for a total of 5 classes in the certificate program said there wasn't enough room in the class although only 1/3 of the lecture—hall were filled with students. So there are classes I've taken but not counted on my degree or certificate but I've been charged for despite the faculty breaking the implied promise and contract of student university in many, many, ways.

So there are obvious frustrations of purpose, that may warrant an emergency injunction to suspend the tolling of time for degree completion.

I've asked for an extension from my dept, but waiting for a reply.

Discrimination started when University found out of my past lawsuit regarding injury at another university, where injury of cervical radiculopathy rose to severity equivalent to disability. And Ford School of PUblic Policy held an extracurricular interview with me after being admitted to their STPP program when I had already registered and was enrolled in the 2nd class of the 5 class certificate program. They unaccepted me for fraudulent reasons in addition to discussing only my past disability lawsuit.

Dated: September 22. Respectfully Submitted

Alex Kazerooni

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Case 2:18-cv-11326-SJM-MKM FECFOVER SPORT STATE CONTROL REPORT OF STATE OF

the JS 44 civil cover sheet and the information contained herein neither replace nor supplement the filing and service of pleadings or other papers as required by law, except as provided by local rules of court. This form, approved by the Judicial Conference of the United States in September 1974, is required for the use of the Clerk of Court for the purpose of initiating the civil docket sheet. (SEE INSTRUCTIONS ON NEXT PAGE OF THIS FORM.)

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I. (a) PLAINTIFFS Alexander C. Kazerooni				sity of Michigan College of Er	lla Kazerooni-Nino, University ngineering, Universeity of
(b) County of Residence of	of First Listed Plaintiff VACEPT IN U.S. PLAINTIFF C	Washtenaw County 4SES			Wa <u>shten</u> aw
(c) Attorneys (Firm Name, Address, and Telephone Number) Pro Se, PO Box 7433 Ann Arbor, MI 48107			Case:2:18-cv-11326 Judge: Murphy, Stephen J. A MJ: Majzoub, Mona K. J: Filed: 04-27-2018 At 03:25 PM CMP KAZEROONI V. ZURBUCHEN ET AL (N A)		
II. BASIS OF JURISDI	CTION (Place an "X" in C	One Box Only)	III. CITIZENSHIP OF P	RINCIPAL PARTIES	
1 U.S. Government Plaintiff	3 Federal Question (U.S. Government Not a Party)		_	FF DEF 1	
2 U.S. Government Defendant			Citizen of Another State	2 Incorporated and I of Business In 2	
			Citizen or Subject of a Foreign Country		□ 6 □ 6
IV. NATURE OF SUIT		nly) DRTS	FORFEITURE/PENALTY	Click here for: Nature	of Suit Code Descriptions. OTHER STATUTES
					375 False Claims Act
110 Insurance 120 Marine 130 Miller Act 140 Negotiable Instrument 150 Recovery of Overpayment & Enforcement of Judgment 151 Medicare Act 152 Recovery of Defaulted Student Loans (Excludes Veterans) 153 Recovery of Overpayment of Veteran's Benefits 160 Stockholders' Suits 190 Other Contract 195 Contract Product Liability 196 Franchise REAL PROPERTY 210 Land Condemnation 220 Foreclosure 230 Rent Lease & Ejectment 240 Torts to Land 245 Tort Product Liability 290 All Other Real Property	PERSONAL INJURY 310 Airplane 315 Airplane Product Liability 320 Assault. Libel & Slander 330 Federal Employers' Liability 340 Marine 345 Marine Product Liability 350 Motor Vehicle 355 Motor Vehicle Product Liability 360 Other Personal Injury 362 Personal Injury Medical Malpractice CIVIL RIGHTS 440 Other Civil Rights 441 Voting 442 Employment 443 Housing' Accommodations 445 Amer. w/Disabilities - Employment 446 Amer. w/Disabilities - Other 448 Education	PERSONAL INJURY 365 Personal Injury - Product Liability 367 Health Care/ Pharmaceutical Personal Injury Product Liability 368 Asbestos Personal Injury Product Liability PERSONAL PROPERT 370 Other Fraud 371 Truth in Lending 380 Other Fraud 371 Truth in Lending 380 Other Personal Property Damage Product Liability PRISONER PETITION Habeas Corpus: 463 Alien Detainee 510 Motions to Vacate Sentence 530 General 535 Death Penalty Other: 540 Mandamus & Other 550 Civil Rights 555 Prison Condition 560 Civil Detainee - Conditions of	of Property 21 USC 881 690 Other	422 Appeal 28 USC 158 423 Withdrawal 28 USC 157 FROPERTY RIGHTS 820 Copyrights 830 Patent 835 Patent - Abbreviated New Drug Application 840 Trademark SOCIAL SECURITY 861 HIA (1395ft) 862 Black Lung (923) 863 DIWC/DIWW (405(g)) 864 SSID Title XVI 865 RSI (405(g)) FEDERAL TAX SUTS 870 Taxes (U.S. Plaintiff or Defendant) 871 IRS - Third Party 26 USC 7609	□ 375 False Claims Act □ 376 Qui Tam (31 USC □ 3729(a)) □ 400 State Reapportionment □ 410 Antitrust □ 430 Banks and Banking □ 450 Commerce □ 460 Deportation □ 470 Racketeer Influenced and □ Corrupt Organizations □ 480 Consumer Credit □ 490 Cable Sat TV □ 850 Securities/Commodities/ □ Exchange □ 890 Other Statutory Actions □ 891 Agricultural Acts □ 893 Environmental Matters □ 895 Freedom of Information □ Act □ 896 Arbitration □ 899 Administrative Procedure □ Act/Review or Appeal of □ Agency Decision □ 950 Constitutionality of □ State Statutes
V. ORIGIN (Place an "X" i	n One Box Only)	Confinement			
	moved from 3 ate Court	Remanded from Appellate Court		rred from 6 Multidistr r District Litigation Transfer	
VI. CAUSE OF ACTIO	Americans with Disa Brief description of ca	ibilities Act (ADA) becan ause:	e filing (Do not cite jurisdictional state me law in 1990, Rehabilitation Ac G. Government, Breach of Contrac	utes unless diversity); et of 1973, 42 U.S. Code § 30	
VII. REQUESTED IN CHECK IF THIS IS A CLASS ACTION UNDER RULE 23, F.R.Cv.P.		DEMAND S	CHECK YES only JURY DEMAND:	if demanded in complaint: : Yes No	
VIII. RELATED CASI IF ANY	E(S) (See instructions):	JUDGE		DOCKET NUMBER	
DATE		SIGNATURE OF ATTO	ORNEY OF RECORD		
April 26, 2018 FOR OFFICE USE ONLY					
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Case 2:18-cv-11326-SJM-MKM ECF No. 1 filed 04/27/18 PageID.4 Page 4 of 6 URSUANT TO LOCAL RULE 83.11 Yes Is this a case that has been previously dismissed? 1. If yes, give the following information: Court: Case No.: Judge: 2. Other than stated above, are there any pending or previously discontinued or dismissed companion cases in this or any other Yes court, including state court? (Companion cases are matters in which No it appears substantially similar evidence will be offered or the same or related parties are present and the cases arise out of the same transaction or occurrence.) If yes, give the following information: Court: Case No.: Judge: _____ Notes:





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